

Dylan P. Todd (NV Bar No. 10456)  
Lee H. Gorlin (NV Bar No. 13879)  
FORAN GLENNON PALANDECH PONZI  
& RUDLOFF PC  
2200 Paseo Verde Parkway, Suite 280  
Henderson, NV 89052  
Telephone: 702-827-1510  
Facsimile: 312-863-5099  
[dtodd@fgppr.com](mailto:dtodd@fgppr.com)  
[lgorlin@fgppr.com](mailto:lgorlin@fgppr.com)

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY AND ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

CASE NO. 2:20-cv-00425-JCM-DJA

**STIPULATION AND ORDER TO  
WITHDRAW PLAINTIFFS' MOTION  
TO COMPEL DISCOVERY  
RESPONSES (ECF No. 76)**

**Plaintiffs,**

## Defendants

Plaintiffs Allstate Insurance Company, Allstate Property & Casualty Insurance Company, Allstate Indemnity Company and Allstate Fire and Casualty Insurance Company (“collectively “Plaintiffs” or “Allstate”) and Defendants Obteen N. Nassiri and Med Ed Labs (collectively “Defendants”) by and through their respective counsel, hereby stipulate and agree that Allstate’s pending Motion to Compel Discovery Responses (ECF No. 76) be withdrawn without prejudice and the briefing schedule be vacated.

111

111

111

111

1       The parties state as follows:

2       1. Defendants have been working on supplementing their disclosures of documents  
3 and responses to Plaintiffs' requests for production to MEL and have supplemented the same.

4       2. To date, Defendants have provided over 5,700 pages of documents.

5       3. As Defendants have provided supplemental productions, the parties have submitted  
6 four (4) stipulations to extend the briefing schedule on the Subject Motion.

7       4. Instead of continuing to extend briefing by one week at a time, the parties agree that  
8 it would be more prudent to allow Allstate to withdraw its Motion, without prejudice, as Allstate  
9 continues to review the supplemental documents.

10       5. In the meantime, should Defendants discover additional responsive documents, they  
11 will provide appropriate supplements.

12       6. This stipulation shall not be construed as a waiver or admission that any documents  
13 and/or categories of documents are no longer outstanding or that Allstate waives any right to seek  
14 the Court's intervention if it is determined that documents responsive to Allstate's First Requests  
15 for Production to Med Ed Labs is incomplete following review of the provided materials. Allstate's  
16 review of the supplemental documents is ongoing. Moreover, this stipulation shall not be construed  
17 as a waiver of any party's right to seek an extension of discovery deadlines should an extension  
18 become necessary.

19       ///

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28       ///

1       7. Should Allstate's review reveal any documents and/or categories of documents that  
2 Allstate feels remain outstanding, the parties will meet-and-confer to attempt to resolve any issues.  
3 If the issue(s) cannot be resolved, Allstate reserves all rights to file a new Motion to Compel to  
4 address any remaining issues.

5 Dated this 23<sup>rd</sup> day of March 2021

6 FRIZELL LAW FIRM

7  
8 /s/ R. Duane Frizell  
9 R. Duane Frizell (NV Bar 9807)  
10 400 N. Stephanie Street, Suite 265  
Henderson, NV 89014

11 *Attorneys for Defendants*

Dated this 23<sup>rd</sup> day of March 2021

FORAN GLENNON PALANDECH PONZI  
& RUDLOFF PC

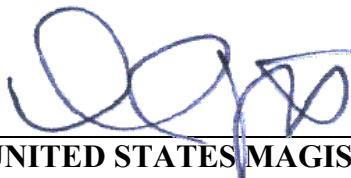
/s/ Lee H. Gorlin  
Dylan P. Todd (NV Bar No. 10456)  
Lee H. Gorlin (NV Bar No. 13879)  
2200 Paseo Verde Parkway, Suite  
Henderson, NV 89052

*Attorneys for Plaintiffs*

14 **ORDER**

15  
16 **IT IS SO ORDERED**

17 DATED this 24th day of March 2021



18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **STIPULATION AND ORDER TO WITHDRAW PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES (ECF No. 76)** was served by the method indicated:

**BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set

- forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: March 23, 2021

/s/ *Regina Brouse*  
An Employee of Foran Glennon